

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
FORT WAYNE DIVISION**

CHRISTOPHER E. WASHINGTON,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CASE NO. 1:20-CV-389
	)	
BRISTOL WEST INSURANCE GROUP,	)	
	)	
	)	
Defendant.	)	

**DEFENDANT’S MOTION TO DISMISS  
PLAINTIFF’S COMPLAINT(S) PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 12(b)(1)**

NOW COMES, the Defendant, BRISTOL WEST INSURANCE COMPANY, erroneously sued as “Bristol West Insurance Group”, by counsel, Law Offices of Staff Counsel For Farmers Insurance Exchange and Affiliates, and presents its Motion to Dismiss Plaintiff’s Complaint and Amended Complaint Pursuant To Federal Rule of Civil Procedure 12(b)(1). In support of Defendant’s Motion to Dismiss, Defendant files its Memorandum of Law contemporaneously with Defendant’s Motion.

WHEREFORE the Defendant, BRISTOL WEST INSURANCE COMPANY, erroneously sued as “Bristol West Insurance Group”, prays that this Honorable Court grant Defendant’s Motion to Dismiss, and for any and all other just and proper relief in the premises.

Respectfully submitted,  
LAW OFFICES OF STAFF COUNSEL FOR  
FARMERS INSURANCE EXCHANGE AND  
AFFILIATES

s/ Adam C. Hawkins

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Adam C. Hawkins, (Bar #22387-49)  
Attorney for Defendant, BRISTOL WEST  
INSURANCE COMPANY erroneously sued as  
“Bristol West Insurance Group”,

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon the following parties of record electronically via email this 14th day of December, 2020:

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s/ Adam C. Hawkins

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